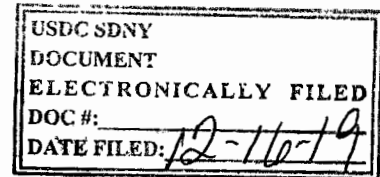


Exhibit 2

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



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In re

CUSTOMS AND TAX ADMINISTRATION OF THE
KINGDOM OF DENMARK (SKAT) TAX REFUND
LITIGATION

18-md-2865 (LAK)

This paper applies to: 19-cv-1867 (LAK), 19-cv-1868
(LAK), 19-cv-1869 (LAK), 19-cv-1895 (LAK),
19-cv-1896 (LAK), 19-cv-1898 (LAK), 19-cv-1904
(LAK), 19-cv-1906 (LAK), 19-cv-1911 (LAK),
19-cv-1924 (LAK)
----- x

PRETRIAL ORDER NO. 13
(Defendants' Motion to Dismiss Under Rule 12(b)(1))

LEWIS A. KAPLAN, *District Judge*.

The motion to dismiss under Rule 12(b)(1) [18-md-2865, DI-134] is denied for substantially the reasons stated in SKAT's memorandum dated July 19, 2019 [18-md-2865, DI-158].

SO ORDERED.

Dated: December 16, 2019

A handwritten signature in black ink, appearing to read "Lewis A. Kaplan".

Lewis A. Kaplan
United States District Judge